

EXHIBIT 2

In the Matter of:

Very Reverend Georges F. de Laire, J.C.L. vs

Gary Michael Voris, et al.

Gary Michael Voris

February 08, 2023

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Very Reverend Georges F. de Laire, J.C. 10(b)(6) Videotaped
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1 talking about, that could still use some more
2 drafting, may have been, hey, here's all of our
3 points, Marc, this is everything we know from, like, a
4 journalistic standpoint to blah, blah, blah, you know,
5 you know more about the specific details of it, you
6 know, so could you please put that together? Could
7 you incorporate that stuff? I just don't have a clear
8 memory. But any one of those situations is entirely
9 plausible.

10 Q. Okay. And then, ultimately, the litigation
11 was initiated, correct?

12 A. Yes.

13 Q. And after the litigation was initiated, did
14 you inform Marc Balestrieri?

15 A. I -- I don't have a memory it. I -- I can't
16 imagine I didn't, but I don't have a memory of doing
17 so. He's come to know at some point, so I don't know
18 when that happened, but in general, the answer is yes.
19 When that happened -- and do I have a clear memory of
20 when, how and all of that, I do not have a clear
21 memory of it, other than he has come to know about it.
22 So, somewhere along the way he was informed.

23 MS. ELOVECKY: Okay. I'm gonna share a
24 document.

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1 thing I said is, what is this? Like, why is this
2 happening now a year after the fact? And -- and I
3 just remember that was my recollection.

4 Like, why did it take a year to do this, you
5 know, file su -- I mean, I'm not suggesting it's out
6 of the statute of limitations or anything, I'm just
7 saying it seems -- just struck me as peculiar that a
8 year after something, all of a sudden, and now it
9 takes on some sort of new legal life.

10 But the -- I don't remember at that point
11 whether I said -- you know, I'm sure there was some
12 discussion, how to respond to this, what do we do, you
13 know, it would not have been at all outside the bounds
14 of Christine drawing up some sort of response to it as
15 a draft response and then sending that to Marc.

16 It -- she may have just said, oh, well, here
17 Marc, you know more about this. I don't recall that I
18 sent it to Marc. I -- I may have, very well. I don't
19 know, this is years ago at this point so I don't have
20 clear memories of all this level of detail.

21 But it is normal here -- as a matter of fact,
22 we just had an example for the last two weeks.
23 Oftentimes when we do an article, for example, if we
24 put in an image or a picture or somebody's logo or

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1 something like that, there are -- I guess the
2 Internet's version of ambulance-chasing lawyers who
3 wait for a copyright to be violated in the publishing
4 of a picture, and then they send you a note and say,
5 you know, hey, you owe us \$895 or my client
6 wants \$895, my client wants \$2,473 for that.

7 Christine, because of her legal background
8 and her being a lawyer, has written up the official
9 response to that, and so when it comes, when those
10 things come in to whoever happens to open up whatever
11 e-mail they come in to, because they come in to all
12 sorts of various e-mails, we send it to Christine,
13 Christine takes over, sends the response on, and --
14 and that's the matter. That may very well have been
15 the case with this as well. I just provide that as
16 sort of a context for, you know, Christine doing some
17 of this stuff.

18 So she may have written a initial response.
19 She may have picked up the phone and called Marc,
20 talked about, here are some things, so that whatever
21 he -- she told him, he may have incorporated into that
22 response.

23 We may have had a response earlier than his,
24 and what that letter is, the -- the rough draft he's